

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA
ex rel., BROOKS WALLACE,
ROBERT FARLEY and
MANUEL FUENTES**

Plaintiffs,

v.

EXACTECH, INC.

Defendant.

**CIVIL ACTION NO:
2:18-CV-01010-LSC**

UNOPPOSED

**PLAINTIFF'S AMENDED MOTION TO MODIFY DISCOVERY SCHEDULE
AND EXTEND DISCOVERY DEADLINES**

COMES NOW, the Plaintiffs/Relators and files this Amended Motion to Modify the Discovery Schedule and Extend Discovery Deadlines in the above-referenced matter. As grounds the Plaintiffs/Relators state as follows:

1. On or about April 26, 2021, the Plaintiffs/Relators filed their Motion to Modify the Discovery Schedule and Extend Discovery Deadlines. (See Doc. No. 79) The extension of the deadlines as proposed in said motion was opposed by the Defendant.

2. Since the filing of the Motion to Modify the Discovery Schedule and Extend Discovery Deadlines, however, the Defendant has expressed their agreement with the Plaintiffs/Relators that in the interest of justice and judicial economy there is a need for the current scheduling order to be modified.

3. Therefore, after consulting with each other, the parties have mutually agreed upon a modified scheduling order that the parties believe is practical and reasonable.

4. Consequently, the parties respectfully request that this Honorable Court modify the current scheduling order as follows:

Deadline	Current	Proposed
Relators' expert disclosure	5/5	9/9
Exactech's expert disclosure	6/9	10/8
Supplemental disclosures	7/9	10/29
Close of discovery	8/9	11/19
Joint status report	8/23	11/24
Dispositive motions	9/10	12/10
Trial	2/14/2022	5/16/2022

5. Plaintiffs' Counsel has consulted with Defendant's Counsel regarding the requested extensions and Defense Counsel does not oppose the extension of the expert deadlines as proposed.

6. The requested extensions above are in the best interest of the parties, justice and judicial economy and neither party will be prejudiced by the requested extension.

WHEREFORE, for the foregoing reasons, the Plaintiff respectfully requests that this Court to modify the current discovery schedule and to extend the discovery deadlines as set forth above in this amended motion.

Respectfully submitted this 13th day of May, 2021.

/s/ Larry A. Golston

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CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing document upon all counsel of record as listed below via email on this the 13th day of May, 2021.

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